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Time To Answer

DATE FILED: 5/13/2022

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

LYNNE FREEMAN, an individual

Plaintiff.

-against-

TRACY DEEBS-ELKENANEY P/K/A TRACY WOLFF, an individual, EMILY SYLVAN KIM, an individual, PROSPECT AGENCY, LLC, a New Jersey limited liability company, ENTANGLED PUBLISHING, LLC, a Delaware limited liability company, MACMILLAN PUBLISHERS, LLC, a New York limited liability company, UNIVERSAL CITY STUDIOS, LLC, a Delaware limited liability company

Defendants.

Joint Stipulation Extending

Case No. 1:22-cv-02435-AT

WHEREAS, Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Universal City Studios, LLC, Holtzsbrinck Publishers, LLC, d/b/a Macmillan (sued erroneously as Macmillan Publishers, LLC), Entangled Publishing, LLC, Emily Sylvan Kim, and Prospect Agency, LLC (collectively "Defendants") have each accepted service of the Complaint by signing a Waiver of Service of Summons ("Waiver");

WHEREAS, pursuant to the Wavier, Defendants have to and including, May 27, 2022, to respond to the Complaint;

WHEREAS, Plaintiff Lynne Freeman ("Plaintiff") and Defendants agree to further extend Defendants' time to respond to the Complaint to and including June 27, 2022;

WHEREAS, the Complaint relates to the alleged copyright infringement of four (4) books and consists of 94 paragraphs; and

WHEREAS, Defendants require additional time to respond to the Complaint in order to efficiently review the numerous manuscripts at issue and evaluate Plaintiff's claims.

NOW, THEREFORE, it is hereby stipulated, by the parties hereto through their respective counsel, as follows:

That Defendants' time to respond to the Complaint is extended to and including June 27, 2022.

Dated: May 10, 2022

COWAN, DEBAETS, ABRAHAMS, & SHEPPARD LLP

By: Many E Mr. Nancy E. Wolff

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Attorneys for Defendants Tracy Deebs-Elkenaney p/k/a Tracy Wolff, Universal City Studios, LLC, Entangled Publishing, LLC and Holtzsbrinck Publishers, LLC, d/b/a Macmillan sued erroneously as Macmillan Publishers, LLC

Dated: 5/10/2022

KLARIS LAW PLLC

By: Lacy H Koonce Lacy H. ("Tance") Koonce, III 29 Little West 12th Street New York, New York 10014 917-612-5861 lancekoonce@gmail.com

Attorneys for Defendants Emily Sylvan Kim and Prospect Agency, LLC

SO ORDERED.

Dated: May 13, 2022 New York, New York Dated: May 11, 2022

CSReeder. PC

By:

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Attorneys for Plaintiff Lynne Freeman

ANALISA TORRES United States District Judge